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REMARKS/ARGUMENTS

Initially, Applicant would like to express their appreciation to the Examiner for the detailed Official Action provided. However, Applicant notes that the Examiner has not acknowledged that the drawings are acceptable, and it is requested that the Examiner indicate the same in the next Official Action.

Applicant notes that on the Office Action Summary sheet the Examiner has indicated that claims 14-38 are pending. However, our records indicate that claim 20 was canceled in a Preliminary Amendment filed October 6, 2000. Applicant respectfully requests that the Examiner confirm the same in the next Official Communication.

Upon entry of the above amendments claim 14 will have been amended and claims 39-41 will have been added. Claims 14-19 and 21-41 are currently pending, with claims 15-19 and 23-38 being withdrawn from consideration in a previous Official Action.

The Examiner rejected claims 14, 21 and 22 under 35 U.S.C. §103(a) as being unpatentable over ANJO (U.S. Patent No. 5,056,014), or alternatively ANJO in view of KAMADA (U.S. Patent No. 5,595,560) and WATANABE (U.S. 5,297,022).

Applicant, however, respectfully traverses the above-noted rejections and submits that they are inappropriate for at least each of the following reasons.

Although Applicant does not necessarily agree with the Examiner's rejection of the claims on these grounds, nevertheless, Applicant has amended independent claim

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14 to clearly obviate the above noted grounds of rejection in order to expedite prosecution of the present application. In this regard, Applicant notes that ANJO, KAMADA and WATANABE fail to teach or suggest the subject matter claimed in amended claim 14. In particular, claim 14, as amended, sets forth a method of preparing a program for a punch press including, *inter alia*, said program preparing method comprising: identifying punches mounted on the punch support member and dies mounted on the die support member, generating an NC program for the punch press by selecting a punch mounted on the punch support member and a die mounted on the die support member; identifying a punch and a die stored in the tool storage device and selected in generating the NC program; and generating a program for replacement of the punch and die mounted on the support members with the punch and die stored in the tool storage device and selected in generating the NC program. The aforementioned method provides the advantage of easily determining the design pattern and the time for manufacturing the product can be shortened.

Applicant submits that ANJO, KAMADA and WATANABE, alone or in any proper combination, all lack any disclosure of the *program preparing method comprising: identifying punches mounted on the punch support member and dies mounted on the die support member, generating an NC program for the punch press by selecting a punch mounted on the punch support member and a die mounted on the die support member; identifying a punch and a die stored in the tool storage device and selected in*

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generating the NC program; and generating a program for replacement of the punch and die mounted on the support members with the punch and die stored in the tool storage device and selected in generating the NC program.

Applicant further submits that it appears the most ANJO discloses is a method of recognizing a plurality of tools. The device of ANJO reads every station located in an upper board, stores the die number in a storage device and subsequently displays the die and station numbers on the CRT (FIG. 6 and Col. 4, lines 50-55). Alternatively, the device of ANJO may read specified stations and perform a similar procedure beginning with the lowest specified number (FIG. 7 and Col. 5, lines 19-24). Thus, ANJO does not disclose generating an NC program for the punch press by selecting a punch mounted on the punch support member and a die mounted on the die support member; identifying a punch and a die stored in the tool storage device and selected in generating the NC program; and generating a program for replacement of the punch and die mounted on the support members with the punch and die stored in the tool storage device and selected in generating the NC program.

In regard to the alternative rejection, the Examiner appears to acknowledge that ANJO does not disclose both the punch and die having separate identification media, and minimizing tool changing operations. The Examiner relies on the purported teachings of KAMADA and WANTANABE, respectively, to supply the deficiencies of ANJO. However, ANJO lacks any teaching of generating an NC program for the punch press by selecting a punch mounted on the punch support member and a die mounted

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on the die support member; identifying a punch and a die stored in the tool storage device and selected in generating the NC program; and generating a program for replacement of the punch and die mounted on the support members with the punch and die stored in the tool storage device and selected in generating the NC program, as discussed above. Therefore, even assuming, arguendo, that the teachings of ANJO, KAMADA, and WATANABE have been properly combined, Applicant's claimed method of preparing a program for a punch press would not have resulted.

Applicant further submits that similar to claim 14, recites features similar to generating an NC program for the punch press by selecting a punch mounted on the punch support member and a die mounted on the die support member; identifying a punch and a die stored in the tool storage device and selected in generating the NC program; and generating a program for replacement of the punch and die mounted on the support members with the punch and die stored in the tool storage device and selected in generating the NC program. Thus, independent claim 19 is allowable for similar reason as discussed above.

In view of the amendments and arguments herein, Applicant submits that independent claims 14 and 39 are in condition for allowance. With regard to dependent claims 21, 22, 40 and 41, Applicant assert that they are allowable on their own merit, as well as because they depend from independent claims 14 and 39, which Applicant has shown to be allowable.

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Thus, it is respectfully submitted that all of the claims in the present application are clearly patentable over the references cited by the Examiner, either alone or in combination, and an indication to such effect is respectfully requested, in due course.

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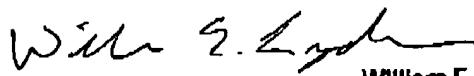
SUMMARY

Applicant submits that the present application is in condition for allowance, and respectfully request an indication to that effect. Applicant has argued the allowability of the claims and pointed out deficiencies of the applied reference. Accordingly, reconsideration of the outstanding Official Action and allowance of the present application and all the claims therein are respectfully requested and is now believed to be appropriate.

Any amendments to the claims which have been made in this amendment, and which have not been specifically noted to overcome a rejection based upon the prior art, should be considered to have been made for a purpose unrelated to patentability, and no estoppel should be deemed to attach thereto.

Should the Examiner have any questions, the Examiner is invited to contact the undersigned at the below-listed telephone number.

Respectfully submitted,
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